JUN 02 2020

David J. Bradley, Clerk Laredo Division

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS LAREDO DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.

MICHAEL THOMAS SAGENBRECHT

L-20-1315

INDICTMENT

MGM

THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

On or about March 18, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

### MICHAEL THOMAS SAGENBRECHT,

did knowingly conspire and agree with each other and with other persons known and unknown to the grand jurors, to conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, in any place, including any building and any means of transportation, an alien who had come to, entered, and remained in the United States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and (v)(I).

### **COUNT TWO**

On or about March 18, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

#### MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that HERMILLO RODRIGUEZ-RODRIGUEZ was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and (v)(II).

### COUNT THREE

On or about March 18, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

# MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that LEONARDO ALCANTARA-RODRIGUEZ, was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and (v)(II).

ORIGINAL SIGNATURE ON FILE

FOREMAN OF THE GRAND JURY

RYAN K. PATRICK UNITED STATES ATTORNEY

Paul Harrison

Assistant United States Attorney

USA-74-24b (Rev. 6-1-71)

L-20-1315

**CRIMINAL DOCKET DIVISION** LAREDO MAG#: 20-01135 FILE: 20-07568 INDICTMENT Judge: Filed: June 02, 2020 ATTORNEYS: UNITED STATES OF AMERICA RYAN K. PATRICK, USA PAUL HARRISON, AUSA VS. MICHAEL THOMAS SAGENBRECHT **CHARGES:** Conspiracy to conceal, harbor or shield an undocumented alien Count.1: [8 USC 1324 (a)(1)(A)(iii) and (v)(I)] Conceal, harbor or shield an undocumented alien Counts. 2-3: [8 USC 1324(a)(1)(A)(iii) and (v)(II)] **TOTAL COUNTS: 3** PENALTY: Counts.1 to 3: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment, \$5,000 special assessment, not more than a three (3)-year term of supervised release [Each Count] In Jail:

On Bond:

Name & Address of Surety:

No Arrest: